

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**MEGAN BARRETT, LINDSEY HOUSER, JENNIFER JONES, JENNIFER SEARD, KIMBERLY CLINTON, ERIN ECKENRODE, JULIE SMYTH, MARIE AVILA, CHRISTY LOWDER and TRACY LE individually and on behalf of a class of similarly situated female employees,**

**Plaintiffs,**

**-- against --**

**FOREST LABORATORIES, INC. and  
FOREST PHARMACEUTICALS, INC.**

**Defendants.**

**Civil Action No. 1:12-cv-05224  
(RA) (GWG)**

**NOTICE OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
APPROVAL OF CLASS  
SETTLEMENT**

**PLEASE TAKE NOTICE** that Plaintiffs Marie Avila, Megan Barrett, Kimberly Clinton, Erin Eckenrode, Lindsey Houser, Jennifer Jones, Tracy Le, Christy Lowder, Jennifer Seard, and Julie Smyth hereby move for an order granting their Motion for Preliminary Approval of the Class Settlement.

Submitted in support of the Motion are Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of the Class Settlement, the Declarations of Deborah K. Marcuse and David W. Sanford in Support of the Motion for Preliminary Approval of the Class Settlement, and a [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of the Class Settlement.

Date: October 6, 2017

Respectfully Submitted,

/s/ Deborah K. Marcuse

Deborah K. Marcuse

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*Attorneys for Plaintiffs and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2017, true and correct copies of the foregoing documents were served upon all counsel of record via ECF.

/s/ Deborah K. Marcuse  
Deborah K. Marcuse